

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII**

IN RE:

**ESTATE OF FERDINAND E. MARCOS
HUMAN RIGHTS LITIGATION**

MDL NO. 840

No. 86-390

No. 86-330

THIS DOCUMENT RELATES TO:

**Hilao et al v. Estate of Ferdinand
E. Marcos,
and
DeVera et al v. Estate of Ferdinand
E. Marcos.**

**DECLARATION OF
ROBERT A. SWIFT**

Robert A. Swift, declares under penalty of perjury as follows:

1. I am a senior member in the law firm of Kohn Swift & Graf, P.C. (the "Firm"), counsel for the Plaintiff Class in the above-captioned action. I am also the Lead Counsel for the Class.

2. By Order dated May 24, 2006 the Court directed Class Counsel to distribute class notice in a form approved by the Court.

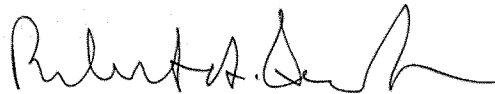
3. Pursuant to that direction, I caused class notice to be mailed to all class members who submitted claim forms in both 1993 and 1999. On May 25, 2006 I caused the class notice (in English) to be mailed via first class postage from my office to all class members residing outside the Philippines, except that class

notice was sent via air mail to persons residing outside the United States (other than the Philippines). A copy of the class notice is attached hereto.

4. In coordination with me, my Philippine co-counsel, Rodrigo Domingo, caused class notice in both English and Tagalog to be printed and mailed in the Philippines via priority mail to 7,422 class members residing in the Philippines. On Friday May 26, 2006 he caused 2,031 letters to be mailed; on Monday May 29, 2006 he caused 5,391 letters to be mailed. The Philippine Postal Service is closed on Saturdays and Sundays.

5. On May 26, 2006 I gave an interview to be aired on the most widely watched television news station in the Philippines, ABS-CBN, describing the contents of the class notice.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Robert A. Swift", written over a horizontal line.

Robert A. Swift

May 30, 2006